

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

ANTWERPEN CHEVROLET, LTD., et al.,

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Plaintiffs

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Civil Action No. CCB02CV1271

vs.

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RESOLUTION PROVIDERS, INC., et al.,

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Defendants

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AFFIDAVIT OF PRICE O. GIELEN, ESQUIRE

I, PRICE O. GIELEN, am a member of the Bar of this Court and one of the attorneys of record representing Plaintiffs, Antwerpen Chevrolet, Ltd., Antwerpen Dodge, Ltd., Antwerpen Motorcars, Ltd., and J.A. Motorcars, Inc., all d/b/a Antwerpen Automotive Group (“Antwerpen”), and Argo Insurance Company (“Argo”), in the above-captioned matter. I do solemnly affirm that the matters set forth herein are true and correct based upon my personal knowledge.

1. Prior to the Deposition noticed for November 20, 2002, I spoke with Justin Hawkins, counsel for Defendants Resolution Providers, Inc., Carol Scott Stevens and Mark L. McDonald. Mr. Hawkins informed me that his clients would not attend the deposition.

2. In early December, I attempted to secure a December date for the depositions of Stevens and McDonald from Mr. Hawkins. Because of the unresolved motions to compel production of documents and answers to interrogatories, we agreed to postpone the depositions until after the court ruled on the motions to compel.

3. On January 7, 2003, we noticed the depositions of Stevens and McDonald for January 22, 2003, in an effort to move forward with discovery.

4. On January 20, 2003, I spoke with Justin Hawkins who informed me that he has been unable to reach his clients since early December and, consequently, he had no alternative deposition dates to offer. Mr. Hawkins said he would contact me if he were able to contact his clients, but I have heard nothing further from him concerning the scheduling of their depositions.

I SOLEMNLY AFFIRM under the penalties of perjury that the matters and facts set forth in this Affidavit are true and correct.

April 8, 2003

_____/s/_____
Price O. Gielen